

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ABG INTERMEDIATE HOLDINGS 2, LLC AND  
ABG-SPG ES, LLC,

Plaintiff,

-against-

BOLT FINANCIAL, INC.,

Defendant.

Case No.: 22-CV-00473(LAK)

**DEFENDANT BOLT FINANCIAL, INC.'S NOTICE OF MOTION TO  
STAY DISCOVERY**

**PLEASE TAKE NOTICE** that Defendant Bolt Financial, Inc., by and through its undersigned counsel, will move this Court, at a date and time to be determined by the Court, for an order staying discovery pending resolution of Bolt's contemporaneously filed Motion to Dismiss the First Amended Complaint. This Motion is based on the accompanying Memorandum of Law in Support of Defendant Bolt Financial, Inc.'s Motion to Stay Discovery, and the Declaration of Phillip B. Jobe dated March 18, 2022, with Exhibit A annexed thereto.

DATED: March 18, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: /s/ Adam Wolfson

Richard I. Werder, Jr.

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